

298-01/WDM/GMV
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HORIZON LINES, LLC., f/k/a
CSX LINES, LLC.,

Petitioner

-against-

A.P. Moller, Managing Owner of MAERSK-
SEALAND, INC.,

Respondent

08-CV-3982 (JSR)

**NOTICE OF CROSS-MOTION TO
CONFIRM ARBITRATION AWARD**

PLEASE TAKE NOTICE, that upon the accompanying Affidavit of Wayne D. Meehan, the exhibits thereto, and the Memorandum of Law, Respondent A.P. Moller A/S (hereinafter "Maersk") will move this Court before the Honorable Jed S. Rakoff, United States District Court Judge for the Southern District of New York, in Courtroom 14-B, 500 Pearl Street, New York, New York, at a date and time to be established by the Court, for an order, pursuant to the Federal Arbitration Act, 9 U.S.C. §1 *et. seq.*, (i) confirming the Award of the Society of Maritime Arbitrators made in New York, New York on January 30, 2008, and (ii) directing the entry of judgment thereon, together with Maersk's attorneys fees and costs of this action, and for such and other further relief as this Court may deem just and proper.

DATED: New York, New York
July 11, 2008

Respectfully submitted,

/s/ Wayne D. Meehan
Wayne D. Meehan (WM 9102)
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CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2008, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will automatically send email notification of such filing to all attorneys of record. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the below service list in the manner specified, either via transmission of Notice of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notice of Electronic Filing.

VIA CM/ECF:

Vincent M. DeOrchis
M.E. DeOrchis
DeOrchis & Partners
61 Broadway - 26th Floor
New York, N.Y. 10006

/s/ Wayne D. Meehan
Wayne D. Meehan